

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

HERB CHAMBERS 1186, INC. d/b/a  
HERB CHAMBERS INFINITI OF BOSTON,

Plaintiff,

v.

DONALD A. SMITH, JR., PRESTIGE AUTO  
IMPORTS, INC. d/b/a WEBSTER AUTO  
SALES and REZA PARINEJAD

Defendants.

13-cv-11798-JLT

**JOINT LIST OF PROPOSED DEPONENTS**

Pursuant to the Court's Modified Discovery Order, dated September 23, 2013, the parties – plaintiff Herb Chambers 1186, Inc. d/b/a Herb Chambers Infiniti of Boston ("Chambers Infiniti"), defendant Donald A. Smith, Jr., defendant Reza Parinejad and defendant Prestige Auto Imports, Inc. d/b/a Webster Auto Sales ("Webster Auto") – jointly provide this list of proposed deponents in this case:

<b>Deponent:</b>	<b>Proposed by:</b>
Donald A. Smith, Jr. (defendant)	Chambers Infiniti, Parinejad and Webster Auto
Reza Parinejad (defendant) (deposed for 1 day and second day has not yet been rescheduled)	Chambers Infiniti
Prestige Auto Imports, Inc. d/b/a Webster Auto Sales (defendant) (deposed for 1 day and second day has not yet been rescheduled)	Chambers Infiniti
Robert Toomanians	Chambers Infiniti
Anderson Villefranche	Chambers Infiniti
Kambiz Bazazi	Chambers Infiniti
Chambers Infiniti/Bradford Gomes (plaintiff)	Parinejad and Webster Auto
Michelle Machado	Parinejad and Webster Auto

James Bulger	Parinejad, Webster Auto and Smith
Karen Scaduto	Parinejad and Webster Auto
James Xaros	Parinejad and Webster Auto

This list does not include Keeper of Record depositions.

This list is based on information available to the parties at the present time, and the parties reserve their rights to seek discovery from, and relating to, other persons that may subsequently become known as persons likely to have discoverable information relevant to the claims and defenses in this case.

Date: October 15, 2013

HERB CHAMBERS 1186, INC. d/b/a  
HERB CHAMBERS INFINITI OF BOSTON,

By its attorneys,

REZA PARINEJAD AND PRESTIGE AUTO  
IMPORTS, INC. d/b/a WEBSTER AUTO  
SALES,

By their attorneys,

/s/ Ian J. Pinta  
Howard M. Cooper (BBO #543842)  
hcooper@toddweld.com  
Ian J. Pinta (BBO #667812)  
ipinta@toddweld.com  
Todd & Weld LLP  
28 State Street, 31<sup>st</sup> floor  
Boston, MA 02109  
(617) 720-2626

/s/ Daniel J. Pasquarello  
Daniel J. Pasquarello (BBO #647379)  
Dpasquarello@daintorpy.com  
Michael J. McDermott (BBO #685223)  
mmcdermott@daintorpy.com  
Dain, Torpy Le Ray, Wiest & Garner, P.C.  
129 South Street, 3<sup>rd</sup> Floor  
Boston, MA 02111  
(617) 542-4808

DONALD A. SMITH, JR.

By his attorney,

/s/ Stephen J. Gill  
Stephen J. Gill (BBO #192090)  
11 Middle Street  
Natick, MA 01760  
(508) 395-6869  
Gillfamily3@comcast.net

**CERTIFICATE OF SERVICE**

I, Ian J. Pinta, hereby certify that I have served a copy of the foregoing document on Daniel J. Pasquarello, Esq., Michael J. McDermott, Esq., and Stephen J. Gill, Esq. by first-class mail on October 15, 2013.

/s/ Ian J. Pinta  
Ian J. Pinta